

# **EXHIBIT 19**

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

GOOGLE LLC,

Plaintiff

v.

SONOS, INC.,

Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**REBUTTAL EXPERT REPORT OF SAMRAT BHATTACHARJEE REGARDING NON-  
INFRINGEMENT OF U.S. PATENT NO. 10,779,033 AND OTHER ISSUES**

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particular playback device, wherein transferring playback from the control device to the particular playback device comprises: (a) causing one or more first cloud servers to add multimedia content to a local playback queue on the particular playback device.” Sonos argued that a “playback device” is a Cast-receiver device. Thus, the question for the Patent Showdown was whether when Casting to a Cast-receiver device a “playback queue” is stored locally on the Cast-receiver device. Limitation 1.4, in contrast, has nothing to do with Casting or Cast receivers-it deals with playback on a User Device that occurs *prior* to Casting.

182. [REDACTED]

[REDACTED]

[REDACTED] More specifically, as I showed in my declaration during the Patent Showdown, when Casting, a Cast-receiver may play back a cloud queue ([REDACTED]) [REDACTED].<sup>16</sup> ‘615 Showdown Declaration, ¶¶50, 65, 73.

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<sup>16</sup> [REDACTED]

184. The documents Dr. Schmidt cites confirm that a local playback queue is used *prior* to Casting, whereas a MDx playback queue may be used *after* Casting is initiated. See ¶¶ 166-167. Further, Dr. Schmidt points to the [REDACTED]. [REDACTED]

[illegible]

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back “a remote playback queue” on a User Device prior to Casting, and then transferring playback of “the remote playback queue” to a receiver when Casting. The MDx playback queue that is played back on a receiver device *after* Casting is not played back on a User Device (and does not even exist) prior to Casting. Thus, the opinions I offered in connection with the Patent Showdown on the ‘615 patent are not inconsistent with my opinions here.

**3. Hub Devices With The Accused YouTube Applications Do Not Satisfy Limitation 1.4**

*(A) The Accused YouTube Applications Do Not Play A Playback Queue Provided By A Third-Party Application*

186. As I showed above in connection with my discussion of User Devices, the plain meaning of “remote playback queue” in view of the specification refers to a playback queue provided by a third-party application. The YouTube functionality that Sonos accuses on Hub Devices also does not play a playback queue provided by a third-party application. Thus, Dr. Schmidt cannot show that the Hub Devices play back a “remote playback queue.”

*(B) A Hub Device Is Not In A “Computing Device” In A “First Mode” When A Mobile Device Is Casting To It*

187. It is also my opinion that a Hub Device is *not* a “computing device” operating in the claimed “first mode” when a User Device is Casting to the Hub Device.

188. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

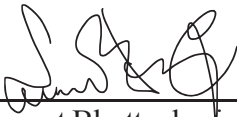
[REDACTED]

[REDACTED]

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I, Samrat Bhattacharjee, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED: January 13, 2023

  
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Samrat Bhattacharjee